

K&L GATES

January 23, 2025

Via ECF

The Honorable Robert M. Levy, U.S.M.J
United States District Court, E.D.N.Y
225 Cadman Plaza East Brooklyn, New York 11201

Re: *NETGEAR, Inc. v. Firemall LLC*
U.S. District Court - Eastern District of New York, Docket No. 1:24-cv-05338-RML

Dear Judge Levy,

I represent the plaintiff NETGEAR, Inc. in the above referenced matter. In accordance with the Court's January 16, 2025 text order, I write jointly with counsel for defendant Firemall LLC to request the following proposed discovery schedule:

- Each party to serve no more than five (5) requests for documents and three (3) interrogatories, targeted for settlement, on or before February 6;
- Responses and documents to said requests and interrogatories to be provided on or before March 3;
- Mediation to be completed by April 1; and
- A joint status letter to be provided by April 8.

The Parties are available to discuss any of the above proposal should the Court have any questions or concerns.

Sincerely,



Morgan T. Nickerson

Encl.